

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.; HYNIX
SEMICONDUCTOR AMERICA, INC.;
HYNIX SEMICONDUCTOR U.K. LTD.; and
HYNIX SEMICONDUCTOR
DEUTSCHLAND GmbH,

Plaintiffs,

vs.

RAMBUS INC.,

Defendant.

CASE NO. C 00-20905 RMW

~~{PROPOSED}~~ ORDER AND STIPULATION
EXTENDING TIME

Judge: Hon Ronald M. Whyte

RAMBUS INC.,

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC., HYNIX
SEMICONDUCTOR AMERICA INC.,
HYNIX SEMICONDUCTOR
MANUFACTURING AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC., SAMSUNG SEMICONDUCTOR,
INC., SAMSUNG AUSTIN
SEMICONDUCTOR, L.P.,

NANYA TECHNOLOGY CORPORATION,
NANCY TECHNOLOGY CORPORATION
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

RAMBUS INC.,

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC., SAMSUNG SEMICONDUCTOR,
INC., SAMSUNG AUSTIN
SEMICONDUCTOR, L.P.,

Defendants.

CASE NO. C 05-02298 RMW

RAMBUS INC.,

Plaintiff,

vs.

MICRON TECHNOLOGY, INC., and
MICRON SEMICONDUCTOR PRODUCTS,
INC.,

Defendants.

CASE NO. C 06-00244 RMW

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME

Whereas the Court entered a Joint Case Management Order ("CMO") on April 24, 2007;

Whereas the CMO provides that July 20, 2007 is the date on which the party or parties with the burden of proof on an issue is required to provide an expert report on that issue;

Whereas the CMO set August 17, 2007 as the date on which the parties are required to provide rebuttal expert disclosures and reports;

Whereas the expert discovery cutoff set forth in the CMO is September 17, 2007;

Whereas the CMO set October 1, 2007 as the last day to file summary judgment and Daubert motions;

Whereas, on June 27, 2007, the Court scheduled a further case management conference to take place on November 7, 2007;

Whereas Micron Technology, Inc., Micron Semiconductor Products, Inc., Hynix Semiconductor, Inc., Hynix Semiconductor America, Inc., Hynix Semiconductor U.K., Ltd., Hynix Semiconductor Deutschland, GmbH, Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, L.P., Nanya Technology Corporation and Nanya Technology Corporation USA (collectively the "Manufacturers") and Rambus Inc. served their expert disclosures on June 22, 2007;

Whereas the Manufacturers' experts require additional time to complete their expert reports;

Whereas the Manufacturers requested a twelve-day extension of time to submit any party's initial expert report(s), and Rambus Inc. agreed to the Manufacturers' request;

Whereas Rambus in turn requested a twenty-four-day extension of the time to submit any party's rebuttal report(s), and the Manufacturers agreed to Rambus's request;

Whereas the parties have agreed, subject to the Court's approval, to modify the schedule set forth in the Joint Case Management Order dated April 24, 2007;

NOW therefore, it is hereby AGREED and STIPULATED, by and among the parties hereto through their undersigned counsel, that: (i) the date on which the party or parties with the burden of proof on an issue shall provide an expert report on that issue is moved from July 20, 2007 to August 1, 2007; (ii) the date on which the parties shall provide rebuttal expert disclosures and reports is moved from August 17, 2007 to September 10, 2007; (iii) the last day for expert discovery is moved from September 17, 2007 to October 8, 2007; (iv) the last day to file summary judgment and Daubert motions is moved from October 1, 2007 to October 17, 2007; and (v) the further case management conference and the hearing date for summary judgment and Daubert motions is moved from November 7, 2007 to November 21, 2007.

SO ORDERED,

DATED: 7/16/07



HON. RONALD M. WHYTE

DATED: July 12, 2007

Respectfully submitted,

FOR THE MANUFACTURERS

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DATED: July 12, 2007 FOR RAMBUS INC.

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Dated: 7/16/07 SPT
Chambers of Judge Whyte